



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/AFM/KCB
F. #2018R01047

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 18, 2022

By ECF

The Honorable Arlene R. Lindsay
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Aventura Technologies
Docket No. 19-CR-582 (DRH) (ARL)

Dear Judge Lindsay:

The government respectfully seeks permission to submit a memorandum in response to the reply brief recently filed by defendant Aventura Technologies (“Aventura”) seeking the return of seized funds, see ECF No. 232.

As the Court is aware, the defendant filed its reply after a four-month hiatus. Aventura’s opening brief was filed on August 11, 2021, and the government opposed on September 20, 2021, but the defendant did not reply until January 27, 2022. Filing a short sur-reply will permit the government to respond to issues newly raised in the defendant’s reply brief and bring to the Court’s attention any intervening relevant authority.

Respectfully submitted,

BREON PEACE
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